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FEB 20 2008

FCC Mail Room

February 19, 2008

**By US Postal Service:**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**By Commercial overnight delivery:**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

re: EB Docket No. 06-36

Dear Ms. Dortch:

Please find enclosed an original and five (5) copies of the CPNI Compliance Certificate and the Accompanying Statement requirements for Helix Telephone Company, Inc., TRS 809256.

Please return a stamped copy in the enclosed SASE. If there are any questions, I may be reached on 503-612-4400.

Sincerely,

Dorrene Benthin  
Senior Consultant

Enclosures

Copies to:  
Federal Communications Commission  
Enforcement Bureau  
445 - 12<sup>th</sup> Street SW  
Washington, DC 20554

Best Copy & Printing Inc.  
445 - 12<sup>th</sup> Street, Suite CY-B402  
Washington, DC 20554

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Annual 47 C.F.R. §64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64-2009(e) CPNI Certification for 2007

Date filed: February 19, 2008

Name of Company Covered by this certification: Helix Telephone Company

Form 499 Filer ID: 809256

Name of signatory: Jim Smith

Title of signatory: President

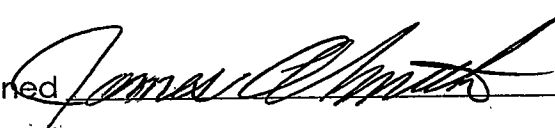
I, Jim Smith, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any action against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

  
Jim Smith

### CPNI Compliance Accompanying Statement:

This accompanying statement explains how Helix Telephone Company's operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Helix Telephone Company adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns ;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of Helix Telephone Company's policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Helix Telephone Company is including its CPNI Manual, without the sample Forms, as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64, of Title 47 of the Code of Federal Regulations.



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# Definitions

This Helix Telephone Company (hereinafter Helix) CPNI policy manual relies on the following definitions:

- (1) **Account information.** "Account information" is information that is specifically connected to the customer's service relationship with Helix, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.
- (2) **Address of record.** An "address of record," whether postal or electronic, is an address that the carrier has associated with the customer's account for at least 30 days.
- (3) **Affiliate.** The term "affiliate" means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another to own an equity interest (or the equivalent thereof) of more than 10 percent.
- (4) **Breach.** When a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.
- (5) **Call detail information.** Any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call.
- (6) **Communications-related services.** The term "communications-related services" means telecommunication services, information services typically provided by Helix and services related to the provision or maintenance of customer premises equipment.
- (7) **Customer.** A customer of Helix is a person or entity to which Helix is currently providing service.
- (8) **Customer premises equipment (CPE).** The term "customer premises equipment (CPE)" means equipment employed on the premises of a person (other than a carrier) to originate, route, or terminate telecommunications.
- (9) **Customer Proprietary Network Information.** The term "customer proprietary network information" means –
  - (A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of Helix, and that is made available to Helix solely by virtue of the Helix-customer relationship; and
  - (B) information contained in the bill pertaining to telephone exchange service or telephone toll service received by a customer of Helix; except that such term does not include subscriber list information.
- (10) **Data broker.** A person or business that offers for sale CPNI obtained by pretexting.

- (11) **Data bureau.** A company that provides information technology services to telecommunications carriers, specifically billing services and customer record detail. Data bureaus typically have access to call detail CPNI (see Independent contractor).
- (12) **FCC.** The acronym "FCC" refers to the Federal Communications Commission.
- (13) ***Independent contractor.*** Any person or business that may provide services to telecommunications carriers. This includes, but is not limited to; joint venture partners and independent contractors for the purposes of marketing communications-related services to a customer; billing services; customer record detail; central office equipment vendors; engineering; and construction. Independent contractors typically have access to call detail and/or non-call detail CPNI.
- (14) **Information services typically provided by Helix.** The phrase "information services typically provided by Helix" means only those information services that are typically provided by Helix, such as Internet access or voice mail services. Such phrase "information services typically provided by Helix," as used in this manual, shall not include retail consumer services provided using Internet website (such as travel reservation services or mortgage lending services), whether or not such services may other wise be considered to be information services.
- (15) **Joint venture partners** (short term alliances of telecommunications carriers) **and independent contractors** (see Independent contractors) **for the purposes of marketing communications-related services to a customer.** A specific subset of persons or businesses that provide marketing services to telecommunications carriers. Any marketing use of CPNI by this subset must have opt-in approval by the affected customers.
- (16) **Local exchange carrier (LEC).** The term "local exchange carrier (LEC)" means any person that is engaged in the provision of telephone exchange service or exchange access. Such term does not include a person insofar as such person is engaged in the provision of a commercial mobile service under section 332(c) of TA-96, except to the extent that the Commission finds that such service should be included in the definition of such term.
- (17) **Opt-in approval.** The term "opt-in approval" refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. This approval method requires that Helix obtain from the customer affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the Helix's request consistent with the requirements. Based on marketing practices that Helix incorporates at this time there is no need to incorporate this method of approval.
- (18) **Opt-out approval.** The term "opt-out approval" refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method, a customer is deemed to have consented to the use, disclosure, or access to the customer's CPNI if the customer has failed to object thereto within the waiting period described after the customer is provided appropriate notification of Helix's request for opt-out consent consistent with the rules. Based on marketing practices that Helix incorporates at this time there is no need to incorporate this method of approval.

- (19) **Password.** The term "password" means a secret word or sequence of alpha and numeric characters which is used to limit access to a customer's account to authorized individuals. At this time Helix does not permit access to customer CPNI by way of providing a password.
- (20) **Pretexting.** *The term "pretexting" means the practice of pretending to be a particular customer or other authorized person in order to obtain access to that customer's call detail or other private communications records.*
- (21) **Readily available biographical information.** "Readily available biographical information" is information drawn from the customer's life history and includes such things as the customer's social security number, or the last four digits of that number; mother's maiden name; home address; or date of birth.
- (22) **Subscriber list information (SLI).** The term "subscriber list information" means any information –  
(A) identifying the listed names of subscribers of Helix and such subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and  
(B) Helix or an affiliate has published, caused to be published, or accepted for publication in any directory format.
- (23) **Helix or carrier.** The terms "Helix Telephone Company," "Helix," or "carrier" shall have the same meaning
- (24) **Telecommunications service.** The term "telecommunications service" means the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.
- (25) **Telephone number of record.** The telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information."
- (26) **Valid photo identification.** The term "valid photo identification" means an official identification document issued by a federal or state governmental agency that identifies the holder of the document that includes a photograph of sufficient clarity to positively identify the holder of the document.



# Company Policy Regarding CPNI

Helix has chosen not to use CPNI data that enables the company or its affiliates to market *additional products or services*. Accordingly, *Helix's personnel are trained not to use CPNI for such purposes*. Because CPNI is not used for marketing purposes, Helix has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These safeguards include documentation of this policy in this manual and training of Helix personnel with regard to non-use of CPNI data.

In this effort, the Company must follow all applicable FCC rules as contained in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations. Specific Helix procedures are as follows:

## **BUSINESS CUSTOMER EXEMPTION**

If a business customer of Helix has in place a contract for service with Helix that specifies:

- (1) a dedicated Helix account representative as the primary contact,
- (2) who can be reached without going through a call center, and
- (3) Helix's protection of that business customer's CPNI,

then Helix's authentication policies and procedures do not apply to that business customer.

In the event that the dedicated account representative is unavailable for a customer-initiated telephone contact, a primary and a secondary account representative have been established by Helix. Either one of these may discuss call detail CPNI with the business customer during the period of unavailability of the dedicated account representative.

## **ACCESS TO CPNI DATA**

Access to CPNI data is limited to employees or entities with the requisite proper authorization as allowed by FCC rules. Any employees or entities with CPNI access must operate under policies that require nondisclosure of confidential information. Improper use or disclosure of CPNI by employees is subject to disciplinary action up to and including termination.

## **Marketing Programs**

No Helix marketing campaigns are related to CPNI. As a logical outcome of this policy, Helix uses neither opt-in nor opt-out approval from customers with regard to any marketing.

Contact the President if you are uncertain as to the type of information you can use in marketing services to customers.

## **CUSTOMER NOTICE AT INITIATION OF SERVICE**

Customers are informed during the initiation of service with Helix that their CPNI data is not used for marketing purposes. Customers receive annual reminders (Form 8) of this CPNI policy.

## **CUSTOMER NOTICE**

Adequate notice with respect to customer CPNI rights and Helix's duty to protect CPNI is provided in Helix's telephone directory. In addition, a CPNI notice is printed periodically on the customer's billing statement.

## **RECORD OF CUSTOMER COMPLAINTS CONCERNING THE UNAUTHORIZED RELEASE OF CPNI**

All customer complaints concerning the unauthorized release of CPNI will be logged (Form 9) and retained for a period of five years. This information is summarized and included with Helix's annual certification to the FCC.

## **Release of Call Detail Information (Forms 7 & 8)**

### **CUSTOMER INITIATED TELEPHONE ACCOUNT ACCESS**

Release of any CPNI information requested by the customer via a telephone call is prohibited except when:

- the information will be sent via mail USPS to the customer's address of record; or
- Helix will call the telephone number of record and disclose the call detail information.

Helix can proceed with routine customer care procedures if the customer can provide all of the call detail information. Helix will not disclose any call detail other than the information the customer disclosed during that particular contact.

### **RETAIL LOCATION ACCOUNT ACCESS**

Customers or their authorized contacts as allowed by the Telecommunications Act of 1996 – Section 222(c)(2) must have a valid, government issued photo identification, such as a driver's license, passport, or comparable ID to obtain CPNI information.

### **NOTIFICATION OF ACCOUNT CHANGES**

Helix will notify (Form 5) any customer immediately of any account changes including customer phone number, address of record, and any other record that may be created or changed. This notification will be through a voicemail or by USPS mail to the address of record as it was prior to the change. New customers are exempt from this notification at service initiation.

## **PROCEDURES TO PROTECT AGAINST PRETEXTING**

Pretexting is the practice of pretending to be a particular customer or other authorized person in order to obtain access to that customer's call detail or other private communications record. The Company has employed the above procedures and safeguards in order to achieve reasonable measures designed to discover and protect against pretexting.

### **Annual Certification**

Helix will certify annually (Form 2) compliance to the CPNI rules. This certification will be filed with the FCC and will be made publicly available by request.

Helix's annual certification will be signed by an officer as an agent of Helix, stating that he/she has personal knowledge the company has established operating procedures that are adequate to comply with the FCC CPNI rules.

In addition to the annual certification, Helix will provide an accompanying statement explaining how the company's procedures ensure the company is or is not in compliance with the FCC's CPNI rules. In the explanation, Helix will include:

- the training employees receive to protect CPNI.
- the disciplinary process applicable to improper disclosure of CPNI.
- other measures relevant to demonstrate compliance with the FCC's CPNI rules.

### **Notice of Unauthorized Disclosure of CPNI**

Helix is required by FCC rules to notify law enforcement of any CPNI breaches no later than seven (7) days after a reasonable determination of a breach has occurred. Helix will send an electronic notification through the central reporting facility to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI). This notification will include a description of the CPNI that was disclosed, how the breach was discovered, an analysis of the sensitivity of the breached CPNI, and any corrective measures taken to prevent recurrence of such breach.

Responsibility to notify USSS and FBI has been assigned to the President.

### **NOTIFICATION OF CPNI SECURITY BREACHES**

- (1) *Notification of law enforcement agencies* (Form 3). Helix will notify law enforcement of a breach of its customers' CPNI as stated in this section of Helix's CPNI manual. Helix will not notify any of its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement as required and spelled out below.
- (2) *Limitations*. As soon as practicable, but in no event later than seven (7) business day, after reasonable determination of the breach, Helix shall electronically notify the **United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI)** through a central reporting facility. This will be done through the FCC's link to the reporting facility at <http://www.fcc.gov/eb/cpni>.

- a) Notwithstanding any state law to the contrary, Helix shall not notify customers or disclose the breach to the public until 7 full business days have passed after notification to the USSS and the FBI except as in the following two parts of this section.
  - b) If Helix believes that there is an extraordinarily urgent need to notify any class of affected customers sooner than otherwise allowed under the above paragraph of this section, in order to avoid immediate and irreparable harm, it shall so indicate in its notification and may proceed to immediately notify its affected customers only after consultation with the relevant investigating agency. Helix shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.
  - c) If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, such agency may direct Helix not to disclose or notify for an initial period of up to 30 days. Such period may be extended by the agency as reasonably necessary in the judgment of the agency. If such direction is given, the agency shall notify Helix when it appears the public disclosure or notice to affected customers will no longer impede or compromise a criminal investigation or national security. The agency shall provide in writing its initial direction to Helix, any subsequent extension, and any notification that notice will no longer impede or compromise a criminal investigation or national security and such writing shall be contemporaneously logged on the same reporting facility that contains records of notifications filed by carriers.
- (3) *Customer Notification* (Form 4). After Helix has completed the process of notifying law enforcement as listed above, it shall notify its customers of a breach of those customers' CPNI.
- (4) *Recordkeeping*. Helix will maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI as defined in the above section of this manual, and all notifications made to customers. This record must include, if available:
- a) Dates of discovery and notification.
  - b) A detailed description of the CPNI that was the subject of the breach.
  - c) The circumstances of the breach.
  - d) Helix will retain the record for a minimum of 2 years.
- (5) *Supersede*. This section does not supersede any statute, regulation, order, or interpretation in any State, except to the extent that such statute, regulation, order, or interpretation is inconsistent with the provisions of this section, and then only to the extent of the inconsistency.

# **SAFEGUARDS BY Helix**

## **CUSTOMER RECORDS**

All personnel of Helix will be trained annually or upon commencement of employment regarding CPNI policies. These policies include when the employee is authorized to use and *when they are NOT authorized to use CPNI. Any infractions of Helix's CPNI policies will be reported to the President and a record will be made of the infraction(s) and the disciplinary steps taken.*

Discipline for infractions of the policies will be in the form of a letter of reprimand to the employee's file for an initial infraction and termination in the case of a second infraction within a twelve month period.

## **INTERFACE WITH CONTRACTORS**

Helix has occasion to utilize contractors for specific projects needed to conduct its business. Helix requires all its contractors to include the following language in all agreements with Helix:

"Whereas Helix is required by law and its company policies to protect the privacy and security of the information regarding its customers, to the extent that [Name of Contractor], in rendering services for Helix receives customer proprietary network information, as that term is defined under 47 U.S.C. Section 222 and interpreted by the FCC ("CPNI"), [Name of Contractor] shall maintain the confidentiality of such CPNI according to the policies and procedures implemented by Helix. [Name of Contractor] shall promptly delete from its records any CPNI that is received by [Name of Contractor] in its engagement with Helix."

# TRAINING OF EMPLOYEES

## EMPLOYEE TRAINING

The company provides training to employees on the proper use and disclosure of CPNI.

*Helix specific CPNI training will be provided annually and with each newly hired employee.*  
Documentation of training (Form 1) will be kept on file for a period of at least five years.

## **ANNUAL REVIEW BY COMPANY MANAGEMENT**

Helix treats customer privacy as a serious issue. Helix is proud of its long history of reliable, trustworthy service and is vigilant in the steps that will be taken to ensure customer privacy.

Accordingly, Helix policy requires this CPNI Policy Manual to be reviewed *on an annual basis*. This review is conducted at a time set by the President each calendar year.

The President's annual review will include, but may not be limited to a review with GVNW Consulting, Inc. and a review with the Board of Directors.

## Employee Training Certification - CPNI

I, undersigned, hereby acknowledge receiving and reviewing Helix Telephone Company's CPNI *Manual*. *I have completed the training coordinated by Helix Telephone Company's CPNI* Compliance Officer. I further understand my responsibilities to protect CPNI and the disciplinary procedures established by Helix Telephone Company concerning CPNI.

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date CPNI Manual Received: \_\_\_\_\_

Date CPNI Training: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Witnessed by the CPNI Compliance Officer

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



**Certification of CPNI Filing**  
**[Section 64.2009(e) of FCC Rules]**

I hereby certify that I am an Officer of Helix Telephone Company.

I have personal knowledge that Helix Telephone Company established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information Rules and requirements in Part 64 Subpart U of the Federal Communications Commission's Rules. The attached Statement of CPNI Compliance explains how Helix Telephone Company's operating procedures ensure that it is in compliance with the applicable rules.

I am making this certification for the year \_\_\_\_\_.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Office Held

\_\_\_\_\_  
Date

**Breach Notification – Law Enforcement**

This notice has been generated by Helix Telephone Company to comply with Part 64 Subpart U of the Federal Communications Commission's Rules (47 C.F.R. §64.2011) which requires telecommunications carriers to notify the Federal Bureau of Investigation (FBI) and the United States Secret Service (USSS) when a breach to Customer Proprietary Network Information (CPNI) has been detected.

This message has been submitted to the FBI and the USSS via the FCC link - <http://www.fcc.gov/eb/cpni>

A description of the breach follows:

Customer Name on Account: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Breach Performed By: \_\_\_\_\_

Description of Breach: \_\_\_\_\_

Sensitivity Analysis: \_\_\_\_\_

Corrective Measures: \_\_\_\_\_

Date Submitted: \_\_\_\_\_ (Must be reported within 7 days of breach)

Please contact Compliance Officer of Helix Telephone Company to provide instructions and/or gather more information regarding this breach of CPNI.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Printed Name \_\_\_\_\_

**Breach Notification - Customer**

[Date]

[Customer Name]

[Address of Record]

[City, State Zip]

Helix Telephone Company respects your privacy and observes the privacy rules established by the Federal Communications Commission and the Oregon Public Service Commission.

This notice is being sent to you because a breach of your account information has occurred. In compliance with Part 64 Subpart U of the Federal Communications Commission's Rules, Helix Telephone Company was required to notify the Federal Bureau of Investigation and the United States Secret Service of the breach. Please see a summary of the breach information below:

Phone Number: \_\_\_\_\_ Date of Breach: \_\_\_\_\_

Description of Breach: \_\_\_\_\_

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Date Submitted to Law Enforcement: \_\_\_\_\_

Please call our office to receive further information. We appreciate your business and strive to protect your information.

Sincerely,

President

## Notification of Account Changes

[Date]

[Customer Name]

[Address of Record]

[City, State Zip]

Helix Telephone Company respects your privacy and observes the privacy rules established by the Federal Communications Commission and the [State] Public Service Commission.

This notice is being sent to you because of changes made to your account. Current Federal Communications Commission rules require that we notify you of certain situations.

Please see the summary below that describes the reason for this notice. Should you have any questions, please do not hesitate to contact us.

Phone Number: \_\_\_\_\_

Name(s) on Account: \_\_\_\_\_

Recent changes or account activity:

- ☐ New password was created.
- ☐ Password has been changed.
- ☐ Address of record was changed.
- ☐ Email of record was changed.
- ☐ Back-up questions were used to re-issue a lost or forgotten password.

Account activity was recorded on [Date]. Thank you for your business with Helix Telephone Company.

Sincerely,

President

## Certification of Marketing Campaign Effort

The attached marketing documents have been approved and are found to not violate Customer Proprietary Network Information (CPNI) rules established in Part 64 Subpart U of the Federal Communications Commission's Rules and Helix's CPNI Manual.

This certification is made by CPNI Compliance Officer for Helix Telephone Company.

---

Signature

---

Printed Name/Position

---

Date

## Initial CPNI Customer Notification

Date

To our Valued Customers;

Under federal law, you have the right to confidentiality of information regarding the telecommunication services to which you subscribe and Helix Telephone Company has the duty to protect that confidentiality. This confidential information includes such things as, specific services you purchase, the number of services purchased, who your provider is for a service, call detail records, and charges related to services purchased. This information is referred to as Customer Proprietary Network Information (CPNI).

Due to the sensitive nature of CPNI, on April 2, 2007, the Federal Communications Commission (FCC) released new rules pertaining to the security of CPNI with special emphasis on call detail CPNI. Call detail CPNI refers to any and all information pertaining to the transmission of specific telephone calls such as telephone number called, telephone number calling, time, date, charges, location and duration of the telephone call.

In compliance with FCC rules and to protect your call detail information to the best of our ability, Helix has opted to no longer disclose or discuss call detail information during a customer initiated telephone call unless the customer can provide the specific call detail information in question. The call detail information would include such things as the called number, date and time of the call and if applicable, the amount charged for the call. Effective December 8, 2007, the methods below will be the only way in which Helix Telephone Company may disclose or discuss your call detail records with you.

- Helix Telephone Company may discuss only the call detail CPNI you provide such as called number, when it was called, the duration of the call, and, if applicable, the amount charged for the call.
- Helix Telephone Company can call you back at the telephone number of record from which your service is derived.
- Helix Telephone Company can send the call detail information to the address of record that we have on file for you.
- Helix Telephone Company may disclose call detail CPNI to you at our business office with a valid photo ID matching the name listed on the account. Note that we are only authorized to disclose call detail CPNI to the individual(s) listed on the account with a valid photo ID.

The new CPNI rules also require we notify you immediately if address of record is created or changed. The means of notification may be by way of a telephone call from us to your telephone number of record, or by mail to the address of record as it was prior to the change.

Please feel free to contact Helix Telephone Company's local business office at (541) 457 - 2385 with any questions or concerns.

Sincerely,

President

## Annual CPNI Notice

Date

To our Valued Customers;

Helix Telephone Company respects the privacy of our customers and our employees do everything possible to protect information that may be found in your account records. The Federal Communications Commission developed new rules in 2007 that require certain steps be taken to protect Customer Proprietary Network Information (CPNI).

If requested, Helix Telephone Company will provide account information to our customers in one of the following ways:

- 1) we may call the telephone number of record and provide the account information;
- 2) we may mail the information to the address of record; or
- 3) we may provide the information at our office if we are presented with valid photo identification and the individual so identified is on the account.

We do not anticipate that these new rules will interfere with quality customer service. If you wish to receive additional information regarding CPNI rules and how they are implemented in Helix Telephone Company, please call or stop by our office.

Sincerely,

President



# Helix Telephone Company

## Record of Customer Complaints Concerning the Unauthorized Release of CPNI

Month	Year		
Name	Number	Address	
Nature of Complaint			
Name	Number	Address	
Nature of Complaint			
Name	Number	Address	
Nature of Complaint			
Name	Number	Address	
Nature of Complaint			
Name	Number	Address	
Nature of Complaint			
Name	Number	Address	
Nature of Complaint			
Name	Number	Address	
Nature of Complaint			
Name	Number	Address	
Nature of Complaint			
Name	Number	Address	
Nature of Complaint			

Retain for 5 years